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January 10, 2014

BY ECF FILING & EMAIL

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: **Astra Oil Company LLC v. Hydro Syntec Chemicals, Inc.;**
U.S.D.C., Southern District of New York, 13-CV-8395 (ALC)

Dear Judge Carter:

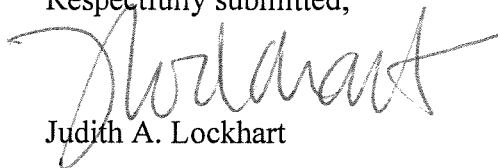
We write to request an extension of time for Hydro Syntec Chemicals, Inc. ("Hydro") to secure counsel to appear on its behalf and file a response to the petition.

In this proceeding, Astra Oil Company LLC ("Astra") petitions the Court to confirm an arbitration award. Carter Ledyard & Milburn LLP was retained on December 19, 2013 by Hydro. Although we have not filed a notice of appearance, we did previously submit a letter motion to the Court requesting an extension of time to respond on behalf of the client. On December 20, 2013, the Court granted an extension of time to respond to Astra's petition until today, January 10, 2014.

In the interim, we have asked Hydro multiple times to provide us with information and documentation relevant to this action so that we would be able to evaluate the facts and prepare a response. However, to date, Hydro has not provided us with any information or documentation. Additionally, we have not been able to reach our client at all since December 30, 2013, despite our frequent efforts to contact the client by both email and telephone. We sent the client an additional email yesterday, January 9, 2014, advising that it was urgent that the client contact us and informing the client that we could not appear in this matter without the necessary information and documentation that we have been requesting. We have not had a response to that email.

We do not know why the client has not contacted us. Under these circumstances, we cannot adequately represent Hydro in this matter. Accordingly, we request that the Court grant Hydro an additional extension of time to respond to the petition in order to seek counsel to appear on its behalf. We spoke with counsel for Astra this morning and he advised that he would not oppose a short extension as long as the hearing scheduled for January 17, 2014 is not adjourned. We are not asserting a retaining or charging lien.

Respectfully submitted,



Judith A. Lockhart

JAL:mhb

cc: **BY ECF & EMAIL**

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Attorneys for Petitioner

BY EMAIL & FIRST-CLASS PRIORITY MAIL

Hydro Syntec Chemicals, Inc. (Attn: David Tsang)